

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DANIEL CAMERON M.D.

Plaintiff,

-against-

JANN BELLAMY M.D., DAVID H. GORSKI M.D.,  
STEVEN NOVELLA M.D., KIMBALL C. ATWOOD IV  
M.D., HARRIET HALL M.D., MARK A. CRISLIP M.D.,

Defendants.  
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Case No.: 7:18-cv-  
10395(VB)

**SASHA R.  
GRANDISON'S  
DECLARATION IN  
SUPPORT OF THE  
MOTION TO DISMISS**

**SASHA R. GRANDISON**, an attorney duly licensed to practice in the Courts of the State of New York and a member of the bar of this Court, declares under penalty of perjury as follows:

1. I am associated with the law firm of WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP, attorneys for defendant JANN BELLAMY i/s/h/a JANN BELLAMY M.D. (hereinafter "Bellamy") and I am fully familiar with all the facts and circumstances pertaining to the within litigation following the review and analysis of the legal file maintained by this law firm for the defense of this action.

2. This Declaration is submitted in support of Bellamy's motion pursuant to Fed. R. Civ. P. 12(b)(2) and (6) seeking dismissal of the Amended Complaint, for an award of attorney's fees and costs, and for such other and further relief as this Court deems just and proper.

3. Attached hereto as **Exhibit "A"** is a true and correct copy of the article entitled "Serious Bacterial Infections Acquired During Treatment of Patients Given a Diagnosis of Chronic Lyme Disease- United States" dated June 16, 2017 and published on the Centers for Disease Control and Prevention website.

4. Attached hereto as **Exhibit “B”** is a true and correct copy of an abstract of the article entitled “Scientific evidence of best patient care practices should guide the ethics of Lyme disease activism” published in the Journal of Medical Ethics on November 21, 2010 and republished on the National Center for Biotechnology Information website.

5. Attached hereto as **Exhibit “C”** is a true and correct copy of an undated article entitled “Lyme Disease Post-treatment Lyme disease syndrome” published on the Centers for Disease Control and Prevention website.

6. Attached hereto as **Exhibit “D”** is a true and correct copy of an article dated March 31, 2016 entitled “Time for a Different Approach to Lyme Disease and Long-Term Symptoms” published in the New England Journal of Medicine.

7. Attached hereto as **Exhibit “E”** is a true and correct copy of the homepage of plaintiff DANIEL CAMERON M.D. on the website “danielcameronmd.com.”

Dated: March 11, 2019

  
Sasha R. Grandison, Esq.